

## **REMARKS**

Applicants have now had an opportunity to carefully consider the Office Action of May 12, 2003. Reexamination and reconsideration are respectfully requested.

### **The Office Action**

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#### **Claims 1-18 Were Presented for Examination**

Claims 3 and 16 stand objected to as being of improper dependent form.

Claims 9 and 10 stand objected to as being dependent upon a rejected base claim, but were indicated to contain allowable subject matter.

Claims 1-8, and 11-18 stand rejected under 35 U.S.C. § 102(b) as being anticipated by DiGiacomo et al. ('219).

#### **The Non-Art Rejections**

Claims 3 and 16, objected to as being of improper form, have been cancelled from this application. Therefore, this objection has been addressed.

#### **The Claims Distinguish Over the Art of Record**

Claim 3, 4, 16, 17 and 18 have been cancelled from this present application. New claims 19-32 have been added, including independent claim 19.

With initial attention to independent claim 1, it is noted this claim has been amended to include the essential limitations of now-cancelled claims 3 and 4.

More specifically, the subject matter of claim 3 now further emphasizes that the step of selecting the scaling factor includes selecting one which is equal to or greater than the largest of the pre-determined scaling ratios.

In rejecting now-cancelled claim 3 which contained this subject matter, column 9, lines 5-30 of the '219 patent was cited. However, in reviewing this section, it is specifically noted that block "34 will set the scale factor to be the most common component size in either the X or Y dimension." (col. 9, lines 13-15). It is further recited that if "the component mix includes two or more most common dimensions, then the lowest value is chosen." (col. 9, lines 17-18). Finally, if there is a mix of widely different sizes, for example, no more than twenty percent of the components are the same size, then a default scale factor of four is utilized (col. 9, lines 19-21).

Applicants respectfully submit that this discussion does not teach the

limitation of selecting a scaling factor that is equal to or greater than the largest of the pre-determined scaling ratios. Rather, it more particularly teaches in some instances an exact opposite concept. Therefore, it is submitted this section does not teach or fairly suggest the concepts now set forth in independent claim 1.

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Secondly, independent claim 1 includes the essential limitations of now-cancelled claim 4. In rejecting claim 4, citation was made to column 8, lines 30-45 and from column 8, line 60 through column 9, line 15, as disclosing the interconnect, via size and transistor geometry scaling ratios now recited in independent claim 1.

Applicants have reviewed this cited section of the '219 patent. Applicants submit column 8, lines 30-45 describe pre-assigned input/output points, and pre-assigned information used by the placement program to place the components which require interconnections to other cards near the input/output points.

On the other hand, column 8, line 60 through column 9, line 15 describe the steps informing the unit and macro models of the components and the card, as well as the selection of the scale factor previously described. However, applicant has found no discussion of the above-noted interconnect, via size or transistor geometry scaling ratios. Therefore, it is submitted the '219 patent does not disclose or fairly suggest any method of calculating a scaling factor which will include calculating the interconnect, via size and transistor geometry ratios for the new and old design rules.

In view of the above distinctions, it is respectfully submitted the '219 patent does not teach or fairly disclose the limitations now set forth in amended independent claim 1.

Dependent claim 15 has been amended to clarify that the "off node" is "an information node."

Remaining claims 2 and 5-15 depend from and further limit independent claim 1. It is considered, for these reasons at least, these claims have been distinguished from the cited art.

Turning to new independent claim 19, this claim has been drafted to include the subject matter of noted-to-be-allowable claim 9. It is submitted the claim, therefore, as drafted is distinguished from the cited art for at least this reason.

New claims 20-32 depend from independent claim 19, and therefore is considered, at least for these reasons, to be distinguished from the cited art.

### CONCLUSION

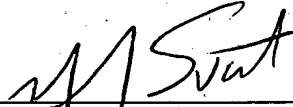
For the reasons detailed above, it is respectfully submitted all claims remaining in the application (Claims 1, 2, 5-15 and 19-32) are now in condition for allowance. The foregoing comments do not require unnecessary additional search or examination.

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In the event the Examiner considers personal contact advantageous to the disposition of this case, he/she is hereby authorized to telephone Mark S. Svat, at (216) 861-5582.

Respectfully submitted,

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